

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

-----	X	
	:	
RALPH S. JANVEY, IN HIS CAPACITY AS	:	
COURT-APPOINTED RECEIVER FOR THE	:	
STANFORD RECEIVERSHIP ESTATE,	:	
AND THE OFFICIAL STANFORD	:	
INVESTORS COMMITTEE,	:	
	:	
<i>Plaintiffs,</i>	:	Case No. 3:13-cv-00477-N
	:	
- against -	:	
	:	
PROSKAUER ROSE LLP, CHADBOURNE	:	
& PARKE LLP, AND THOMAS V.	:	
SJOBLOM,	:	
	:	
<i>Defendants.</i>	:	
	:	
-----	X	

**UNOPPOSED MOTION TO EXTEND PAGE LIMITATION**

Defendant Chadbourne & Parke LLP (“Chadbourne”) respectfully moves this Court for permission to file a brief in support of its forthcoming Motion to Dismiss Plaintiffs’ Original Complaint that exceeds the page limitation set forth in Local Rule of Civil Procedure 7.2(c). Chadbourne’s Motion to Dismiss is due on October 3, 2014. Plaintiffs do not oppose Chadbourne’s request for an extension of the page limitation.

Chadbourne respectfully submits that an extension of the page limitation is necessary and warranted in this case. Plaintiffs’ Original Complaint is 110 pages, and 273 paragraphs, long. It asserts seven causes of action against Chadbourne, and alleges that Chadbourne is responsible for the loss of “billions of dollars in assets.” Pls.’ Original Compl., *Janvey, et al. v. Proskauer Rose LLP, et al.*, No. 3:13-cv-00477-N (N.D. Tex.), at ¶ 270 (Dkt.

No. 1) (Jan. 31, 2013). Given the magnitude and multiplicity of the claims asserted in Plaintiffs' Original Complaint, Chadbourne believes that the requested extension is reasonable.

Chadbourne therefore asks this Court for permission to file a brief in excess of twenty-five (25), and not to exceed fifty (50), pages in support of its forthcoming Motion to Dismiss Plaintiffs' Original Complaint.

Dated: September 23, 2014

PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP

By: /s/ Daniel J. Beller

Daniel J. Beller\*

dbeller@paulweiss.com

Daniel J. Leffell\*

dleffell@paulweiss.com

William B. Michael\*

wmichael@paulweiss.com

1285 Avenue of the Americas

New York, New York 10019-6064

Telephone: (212) 373-3000

Facsimile: (212) 757-3990

*\*Admitted pro hac vice*

-and-

VINSON & ELKINS LLP

By: /s/ William D. Sims, Jr.

William D. Sims, Jr.

bsims@velaw.com

Texas Bar No. 09721500

Harry M. Reasoner

hreasoner@velaw.com

Texas Bar No. 16642000

2001 Ross Avenue, Suite 3700

Dallas, Texas 75201-2975

Telephone: (214) 220-7700

Facsimile: (214) 220-7716

*Attorneys for Defendant Chadbourne &  
Parke LLP*

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rules of Civil Procedure 7.1(a) and 7.1(b), on September 21, 2014, counsel for defendant Chadbourne & Parke LLP conferred with counsel for plaintiffs. Plaintiffs' counsel stated that they are not opposed to Chadbourne & Parke LLP's request for an extension of the page limitation.

/s/ Daniel J. Beller

Daniel J. Beller

**CERTIFICATE OF SERVICE**

On September 23, 2014, I electronically submitted the foregoing document upon the attorneys of record in the above case, in accordance with Federal Rule of Civil Procedure 5 and Local Rule of Civil Procedure 5.4(c), by causing a copy of the same to be filed via the electronic case filing system of the United States District Court for the Northern District of Texas.

/s/ Daniel J. Beller

Daniel J. Beller